



Metropolitan
St. Louis Sewer
District

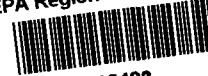
2350 Market Street
St. Louis, MO 63103-2555
(314) 768-6200

E.C.
10/2/05

VIA FACSIMILE AND U.S. MAIL

October 7, 2005

EPA Region 5 Records Ctr.



285183

Mr. Tom Turner
Associate Regional Counsel
USEPA Region V
Office of Regional Counsel (C-14J)
77 West Jackson Boulevard
Chicago, IL 60604

RE: Clayton Chemical Site General Notice Letter

Dear Mr. Turner:

This letter is in response to the Clayton Chemical Site General Notice of Potential Liability Letter dated September 27, 2005, to Mr. Jeff Theerman, Executive Director of The Metropolitan St. Louis Sewer District (MSD). We have only recently become aware of the allegation that MSD sent waste to the Clayton Chemical Site. We are interested in continuing discussions with USEPA to resolve any potential liability in connection with the Site.

MSD is not involved in discussions with state or local authorities, nor is it engaged in the voluntary cleanup action nor a lawsuit regarding the Site. MSD was contacted by large volume PRPs requesting that MSD participate in their settlement process. MSD was not able to resolve a number of questions about the proposed settlement within the available time, so MSD did not participate in the settlement. There is not specific correspondence reflecting that discussion.

In the short time that was available to review MSD's possible involvement at the Site, MSD was not able to confirm its involvement with the Clayton Chemical Site and certainly not at the volumes indicated. The "RRG/Clayton Liquids Removal, Investigation Report" referred to in the General Notice Letter did include tabulations of volumetric contribution which identified the Bissell Point Treatment

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Plant as a generator at the Site. We have not been able to find any manifests or other primary documentation to support those tabulations. The volumes attributed to the Bissell Point Treatment Plant are well in excess of what we would expect from our operation. An internal investigation did not confirm the alleged involvement.

Future contact should be addressed to:

Randy E. Hayman, General Counsel
The Metropolitan St. Louis Sewer District
2350 Market Street
St. Louis, MO 63103-2555

As stated earlier in this letter, MSD is certainly willing to discuss with EPA any concerns raised in the General Notice letter.

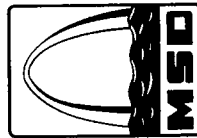
Very truly yours,

A handwritten signature in black ink, appearing to be "R. Hayman", with a horizontal line extending to the right.

Randy E. Hayman
General Counsel

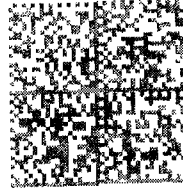
REH:hw

c: Jeff Theerman



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